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16 MR. ARNOLD: Okay. My name is Richard
17 Arnold. I am the Southern Paiute spokesperson for the
18 Consolidated Group of Tribal Organizations. We have
19 some statements we'd like to enter in the record.
20 Specific to the site suitability
21 recommendation or evaluation I should say and there will
22 be some comments specific to the EIS. The CGTO speaks
23 formally for this group, but not on behalf of the tribes
24 that it represents, so therefore does not relieve the
25 Department of Energy, their trust responsibility to

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1 those tribes, which have cultural and historic ties in
2 this area. Government relations are extremely necessary
3 and in doing so due to the trust responsibility and
4 conducting government-to-government relations with those
5 tribes, people should be able to respond to issues that
6 are specific to the meeting at hand.
7 Inadequate notice of meetings and receipt
8 of documents has been a continuous problem that the CGTO
9 has experienced and considering the technicalities of
10 the issues and the documents, more time should be

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11 provided to make sure those documents are received.
12 Documents and notice have not been received in a timely
13 manner. The CGTO questions how the Department of Energy
14 can realistically evaluate the merits of the site,
15 meaning the Yucca Mountain repository.

16 Prior to the issuance of a final completion
17 of transportation studies and destination of
18 transportation issues as under NIPA. We believe the
19 Department of Energy should make every effort to reach
20 out and educate the tribes and all issues specific to
21 the YMP similar to what they do with the county and
22 state, actually the affected units of government.

23 We believe that the Department of Energy
24 has separated many of the documents and issues and have
25 compartmentalized a lot of the elements of the project

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1 including the site suitability evaluation, but does not
2 include issues such as transportation within. The
3 relationships between the documents are really hard for
4 us to follow. We believe that the EIS is incomplete and
5 not in accordance with the NIPA guidelines. Okay.

6 With respect to the
7 government-to-government relations, the CGTO believes

8 and strongly recommends that the Department of Energy 330097
9 needs to meet directly with the tribes, coming to their
10 locations and providing invitations or offers actually
11 to the tribes to come out at the tribes' request.

12 The CGTO further strongly recommends that
13 future hearings and tribal update meetings occur on
14 tribal facilities rather than using commercially owned
15 facilities. The Moapa Paiute tribe of Utah and Las
16 Vegas Paiute tribe among others have agreed to convene
17 these meetings at the DOE's expense using comparable
18 industry rates.

19 The comments period we believe is
20 inadequate for the site evaluation and should be
21 compatible to the EIS. That was six months. During
22 that six month period of time it would allow the
23 Department of Energy to engage in full consultation with
24 the tribes and in doing that consultation again the DOE
25 can send out qualified individuals prepared to respond

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1 to any questions that may arise specific to the
2 government. The site suitability evaluation sent on the
3 August 21st for the comments period ending October the
4 19th. The CTGO believes that this is inadequate and

5 should at least be until February 21st, 2002 or six **330097**
6 months. And then the finalization of the environmental
7 impact statement and the final site suitable evaluation
8 that another six months period of time for comment
9 should be made at that point. And that's the end of the
10 comments. .